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OFCR. THOMAS SMITH, OFCR. ROBERT  
GERBER, OFCR. KYLE HILL, OFCR. RYAN  
GEIS, OFCR. BROCK MARCOTT, SGT. RICK  
HOFFMAN, FMR. CITY MANAGER KWAME  
REED, AND JONATHAN ADAMS ("City  
Defendants")

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

TRENT ALLEN, individually; SHAGOOFA  
KHAN, individually; ADAM CARPENTER,  
individually; JOSHUA BUTLER,  
individually; DEJON RICHARDS,  
individually; DRESHAWN JACKSON,  
individually; KARDELL SMITH,  
individually; DAVID MACKIN, individually,  
TERRY DWAYNE ROBINSON, JR.,  
individually; MANDINGO CAIN,  
individually; AMADEO GARCIA, JR.,  
individually; ARON TYSON, individually;  
DAUNTE GELLINGTON, individually;  
ROBERT YOUNG, individually; TERRY  
THOMAS, individually; SHAQUILLE  
HILLARD, individually; DANYEL EARL  
LACY, individually; MARCELL LEWIS,  
individually; GREGORIO YARBOROUGH,  
individually; QUINCY MASON, individually;  
TAHJAY MCCULLOUGH, individually;

Plaintiffs,

vs.

Case No. 3:23-cv-01895-VC [Consolidated  
with Case Nos. 23-cv-03773-VC and 3:23-cv-  
06573-VC and 24-cv-01774-VC]  
[Hon. Vince Chhabria, Dist. Judge; Hon.  
Sallie Kim, M. Judge]

**[DISCOVERY MATTER]**

**JOINT DISCOVERY STATUS REPORT  
AND BRIEF & REQUEST FOR  
DISCOVERY HEARING**

Date: February 3, 2025

Time: 3:00 p.m.

Crtrm.: Via Zoom

Amend. Consol. Complaint Filed: 05/13/2024

Complaint Filed (Pugh): 03/22/2024

Consol. Complaint Filed: 02/02/2024

1 CITY OF ANTIOCH, a municipal  
 2 corporation; TAMMANY BROOKS,  
 3 individually and in his official capacity as  
 4 police chief for the CITY OF ANTIOCH;  
 5 TONY MOREFIELD, individually and in his  
 6 official capacity as interim police chief for the  
 7 CITY OF ANTIOCH; STEVEN FORD,  
 8 individually and in his official capacity as  
 9 interim police chief for the CITY OF  
 10 ANTIOCH; MATTHEW NUTT, individually  
 11 and in his official capacity as a police officer  
 12 for the CITY OF ANTIOCH; JOSH EVANS,  
 13 individually and in his official capacity as a  
 14 police sergeant for the CITY OF ANTIOCH;  
 15 ERIC ROMBOUGH, individually and in his  
 16 official capacity as a police officer for the  
 17 CITY OF ANTIOCH; MORTEZA AMIRI,  
 18 individually and in his official capacity as a  
 19 police officer for the CITY OF ANTIOCH;  
 20 SCOTT DUGGAR, individually and in his  
 21 official capacity as a police officer for the  
 22 CITY OF ANTIOCH; JOHN RAMIREZ,  
 23 individually and in his official capacity as a  
 24 police officer for the CITY OF ANTIOCH;  
 25 TIMOTHY MANLY WILLIAMS,  
 26 individually and in his official capacity as a  
 27 police officer for the CITY OF ANTIOCH;  
 28 TOM LENDERMAN, individually and in his  
 official capacity as a police officer for the  
 CITY OF ANTIOCH; LOREN BLEDSOE,  
 individually and in his official capacity as a  
 police sergeant for the CITY OF ANTIOCH;  
 THOMAS SMITH, individually and in his  
 official capacity as a police officer for the  
 CITY OF ANTIOCH; CALVIN PRIETO,  
 individually and in his official capacity as a  
 police officer for the CITY OF ANTIOCH;  
 ANDREA RODRIGUEZ, individually and in  
 her official capacity as a police officer for the  
 CITY OF ANTIOCH; JONATHAN ADAMS,  
 individually and in his official capacity as a  
 police officer for the CITY OF ANTIOCH;  
 DEVEN WENGER, individually and in his  
 official capacity as a police officer for the  
 CITY OF ANTIOCH; DANIEL HARRIS,  
 individually and in his official capacity as a  
 police officer for the CITY OF ANTIOCH;  
 ROBERT GERBER, individually and in his  
 official capacity as a police officer for the  
 CITY OF ANTIOCH; KYLE HILL,  
 individually and in his official capacity as a  
 police officer for the CITY OF ANTIOCH;  
 Officer MARCOTT, individually and in his  
 official capacity as a police officer for the

Complaint Filed (*Allen*): 04/19/2023  
 Complaint Filed (*Robinson*): 08/11/2023  
 Deemed Related: 11/08/2023

Trial Date (II Group 1): 09/15/2025  
 Trial Date (II Group 2): 01/26/2026  
 Trial Date (II Group 3): 05/26/2026  
 Trial Date (II Group 4): 09/28/2026

1 CITY OF ANTIOCH; ARRON HUGHES,  
 2 individually and in his official capacity as a  
 3 police officer for the CITY OF ANTIOCH;  
 4 RYAN GEIS, individually and in his official  
 5 capacity as a police officer for the CITY OF  
 6 ANTIOCH; ANTIOCH POLICE  
 7 DEPARTMENT OFFICER MOORE,  
 8 individually and in is official capacity as a  
 9 police officer for the CITY OF ANTIOCH;  
 10 and DOES 1-100, inclusive,

11 Defendants.

12 Pursuant to this Court's October 15, 2024 minute order following the October 11, 2024  
 13 initial Discovery Hearing in the above-captioned matter [Dkt. 267], the Parties hereby submit their  
 14 Joint Discovery Brief. Additionally, per the Court's January 6, 2025 Discovery Hearing with the  
 15 Parties [Dkt. 205], the Parties are requesting that the Court hold the February 3, 2025 Discovery  
 16 Hearing in this matter to address the dispute discussed below.

17 **1. PARTIES' DISPUTE REGARDING PLAINTIFFS' COUNSEL USING TWO**  
 18 **ATTORNEYS TO QUESTION DEPONENTS.**

19 **A. Defendants' Position.**

20 During multiple depositions in this matter, Plaintiffs' counsel from Burris, Nisenbaum,  
 21 Curry & Lacy have been using two attorneys to conduct the depositions of individual defendant  
 22 officers. Such is improper. "While there is no written rule categorically prohibiting deposition  
 23 questioning by more than one attorney, it is the typical practice in [the Northern] District for only  
 24 one attorney to question a witness at deposition." *Finjan, Inc. v. Cisco Systems, Inc.*, 2019 WL  
 25 7753437, at \*2 (N.D. Cal. Sept. 9, 2019). There are no circumstances in this case which support the  
 26 questioning of a deponent by two attorneys from the same law firm, representing the same parties.  
 27 *Cf. id.* ("Circumstances may warrant allowing more than one attorney to ask questions at a  
 28 deposition, such as where the witness is being deposed on clearly distinct claims.").

Moreover, at no point did Plaintiffs' counsel inform defense counsel of their desire to use  
 two attorneys for questioning at depositions. *Id.* ("The far better approach is for parties who believe  
 that a case warrants departure from the general practice of single-attorney questioning to discuss

1 that issue during the Rule 16 or Rule 26 conferences and, if necessary, raise the issue with the Court  
 2 sufficiently in advance of the deposition to permit for an orderly resolution of the issue.”) (citing  
 3 Fed. R. Civ. P. 16(c)(2)(L), 26 (f)). Defendants did not and do not agree that Plaintiffs may use  
 4 more than one attorney at deposition, and there is no reason to stray from typical practices.

#### 5 **B. Plaintiffs’ Position.**

6 Defendants mischaracterize Plaintiffs’ counsel’s handling of depositions. At no point have  
 7 two attorneys conducted questioning at the same time. One attorney has merely handed off the  
 8 baton to a second attorney after asking their questions. This is not prohibited by any rules, and it is  
 9 not improper. *See Rockwell Intern., Inc. v. Pos-A-Traction Industries, Inc.*, 712 F.2d 1324, 1325  
 10 (9th Cir. 1983) (“No provision in the California Civil Code governing depositions prohibits  
 11 questioning by two attorneys”); *see also Caplan v. Fellheimer Eichen Braverman & Kaskey*, 161  
 12 F.R.D. 32, 34-35 (E.D. Penn. 1995) (agreeing with defendants that “the rules are only intended to  
 13 prevent more than one attorney taking a deposition *at the same time*” and ruling narrowly that  
 14 “only one attorney may ask questions at one time”). Moreover, Plaintiffs’ deposition notices all  
 15 state that both attorneys James Cook and Ben Nisenbaum will take depositions.

### 16 **2. STATUS OF DISCOVERY.**

#### 17 **A. Depositions.**

18 The Parties are continuing to schedule, notice, and take depositions of the parties (plaintiffs  
 19 and defendants), third party witnesses, and Persons Most Knowledgeable (“PMKs”).

#### 20 **B. Written Discovery.**

21 [Plaintiffs’ Requests for Production of Documents to Defendant Officers, Set One.] On  
 22 December 26, 2024, Plaintiffs served their Requests for Production of Documents, Set One to  
 23 Defendant Officers.

24 [City Defendants’ Ninth Supplemental Disclosure.] On January 7, 2025, in advance of the  
 25 February 4, 2025 Settlement Conference, City Defendants served their Ninth Supplemental  
 26 Disclosures (126 pages).

27 [Plaintiff Smith’s Supplemental Responses to Defendant Wenger’s Interrogatories, Set One,  
 28 and Requests for Production of Documents, Set One.] On January 7, 2025, Plaintiff Kardell Smith

1 served his Supplemental Responses to Defendant Devon Wenger's Interrogatories, Set One, and  
 2 Requests for Production of Documents, Set One. Smith's Supplemental Responses to Wenger's  
 3 Interrogatories (Set One) indicate that Smith will remove Wenger from both of Smith's causes of  
 4 action.

5 [Meet and Confer Efforts and Related Actions.] On January 14, 2025, City Defendants met  
 6 and conferred with Plaintiffs regarding alleged missing items from City Defendants' production  
 7 identified in Plaintiffs' January 6, 2025, Meet and Confer letter. City Defendants agreed to produce  
 8 the missing items identified and in their possession. Specifically, City Defendants agreed to produce  
 9 all missing items identified and in their possession related to the Group 3 Plaintiffs on January 21,  
 10 2025 in advance of the upcoming Settlement Conference on February 4, 2025. City Defendants also  
 11 agreed to produce the remaining missing items identified and in their possession on January 27,  
 12 2025. City Defendants produced documents on January 27, 2025, including unredacted versions of  
 13 documents previously produced.

14 [Defendant Duggar's Interrogatories to Plaintiff Robinson, Set One.] On January 17, 2025,  
 15 Defendant Scott Duggar served his Interrogatories to Plaintiff Robinson, Set One.

16 [Plaintiffs' Request for Production of Documents, Set Six.] On January 21, 2025, City  
 17 Defendants' timely served their response to Plaintiffs' Request for Production of Documents, Set  
 18 Six (138 pages, 16 a/v files).

19 [City Defendants' Tenth Supplemental Disclosure.] On January 21, 2025, in advance of the  
 20 February 4, 2025 Settlement Conference, City Defendants served their Tenth Supplemental  
 21 Disclosures (600 pages and 11 a/v files) in response to Plaintiffs' January 6, 2025 Meet and Confer  
 22 Letter.

23 [Plaintiff Cain's Supplemental Disclosure.] On January 21, 2025, Plaintiff Mandingo Cain  
 24 served his Supplemental Disclosures (4 a/v files).

25 [City Defendants' Eleventh Supplemental Disclosure.] On January 27, 2025, in advance of  
 26 the February 4, 2025 Settlement Conference, City Defendants served their Eleventh Supplemental  
 27 Disclosures (1,259 pages and 12 a/v files) and Second Amended Privilege Log in response to  
 28 Plaintiffs' January 6, 2025 Meet and Confer Letter.

1 [Plaintiffs' Supplemental Disclosure.] On January 22, 2025, Plaintiffs served Supplemental  
2 Disclosures (44 pages, 1 a/v file, and 1 photo).

3  
4 DATED: January 27, 2025

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LOREN BLEDSOE, OFCR. THOMAS SMITH,

OFCR. ROBERT GERBER, OFCR. KYLE HILL,

OFCR. RYAN GEIS, OFCR. BROCK

MARCOTT, SGT. RICK HOFFMAN, FMR.

CITY MANAGER KWAME REED, AND

JONATHAN ADAMS ("City Defendants")

15 DATED: January \_\_, 2025

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17 By: \_\_\_\_\_

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1 DATED: January 27, 2025

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14 DWAYNE ROBINSON, JR., MANDINGO  
15 CAIN, AMADEO GARCIA, JR., ARON TYSON,  
16 DAUNTE GELLINGTON, ROBERT YOUNG,  
17 TERRY THOMAS, SHAQUILLE HILLARD,  
18 DANYEL EARL LACY, MARCELL LEWIS,  
19 GREGORIO YARBOROUGH, QUINCY  
20 MASON, TAHJAY MCCULLOUGH

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24 NICOLE M. CAHILL

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16 ANDREA RODRIGUEZ

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19 By: /s/ Dale Allen

DALE ALLEN

20 Attorneys for Defendant,  
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1 DATED: January 27, 2025

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4 WENDY MOTOOKA

5 Attorneys for Defendant,

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9 /s/ Kenny C. Park

10 JEFFREY VUCINICH

KENNY C. PARK

11 Attorneys for Defendant,

JOHN RAMIREZ

**FEDERAL COURT PROOF OF SERVICE**

ALLEN, et al. v. CITY OF ANTIOCH, et al. LBBS File No: #55035.3  
USDC/Northern District Case No. 3:23-cv-01895-VC

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and not a party to the action. My business address is 633 West 5th Street, Suite 4000, Los Angeles, CA 90071. I am employed in the office of a member of the bar of this Court at whose direction the service was made.

On January 27, 2025, I served the following document(s): JOINT DISCOVERY STATUS REPORT AND BRIEF & REQUEST FOR DISCOVERY HEARING

I served the documents on the following persons at the following addresses (including fax numbers and e-mail addresses, if applicable):

**SEE ATTACHED SERVICE LIST**

The documents were served by the following means:

☒ (BY COURT'S CM/ECF SYSTEM) Pursuant to Local Rule, I electronically filed the documents with the Clerk of the Court using the CM/ECF system, which sent notification of that filing to the persons listed above.

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.

Executed on January 27, 2025, at Los Angeles, California.

\_\_\_\_\_  
/s/ Abigail J.R. McLaughlin

**SERVICE LIST**

**ALLEN, et al. v. CITY OF ANTIOCH, et al. LBBS File No: #55035.3**

**USDC/Northern District Case No. 3:23-cv-01895-VC**

**[Consolidated with ROBINSON, et al. Case No. 23-cv-03773-SI and 3:23-cv-06573-VC]**

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JACKSON, KARDELL SMITH, DAVID  
MACKIN, AMADEO GARCIA, ARON  
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